

HONORABLE MICHELLE L. PETERSON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BUNGIE, INC., a Delaware corporation,
Plaintiff,

v.

JOSHUA FISHER, JACOB W. MAHURON
A/K/A “PRAGMATIC TAX,” MATTHEW
ABBOTT A/K/A “NOVA,” JOSE
DEJESUS AKA “DAVID HASTINGS”
A/K/A “J3STER,” TRAVERS RUTTEN
A/K/A “TRAVERS7134,” JESSE
WATSON A/K/A “JESSEWATSON3944,”
JOHN DOE NO. 1 A/K/A “CALC”,
ANDREW THORPE A/K/A “CYPHER,”
RYAN POWER AKA “KHALEESI,” JOHN
DOE NO. 4 A/K/A “GOD,” JOHN DOE
NO. 5 A/K/A “C52YOU,” JOHN DOE NO.
6 A/K/A “LELABOWERS74,” JOHN DOE
NO. 7 A/K/A “FRAMEWORK,” KICHING
KANG A/K/A “SEQUEL,” JOHN DOE
NO. 9 A/K/A “1INVITUS,” DAVID
BRINLEE A/K/A “SINISTER,” JOHN DOE
NO. 11 A/K/A “THEGUY,” JOHN DOE
NO. 12 A/K/A “BEATRED,” JOHN DOE
NO. 13 A/K/A “COMMUNITYMODS,”
JOHN DOE NO. 14 A/K/A “PALACE,”
JOHN DOE NO. 15 A/K/A
“VINCENTPRICE,” JOHN DOE NO. 16
A/K/A “ESSWAN,” JOHN DOE NO.
17 A/K/A “ADMIRAL,” JOHN DOE NO. 18
A/K/A “TOMDICKHARRY,” JOHN DOE
NO. 19 A/K/A “ROB,” JOHN DOE NO. 20
A/K/A “STAYLOCKED,” JOHN DOE NO.

Case No. 2:23-cv-01143-MLP

MOTION FOR ENTRY OF DEFAULT
AGAINST DEFENDANT JOSE DEJESUS
A/K/A “DAVID HASTINGS,” A/K/A
“J3STER”

NOTE ON MOTION CALENDAR:
January 10, 2025

21 A/K/A “FIVE-STAR,” JOHN DOE NO.
22 A/K/A “HORROR,” JOHN DOE NO. 23
A/K/A ELITECHEATZ.CO, JOHN DOE
NO. 24 A/K/A MIHAI LUCIAN, JOHN
DOE NO. 25 A/K/A NATHAN BERNARD,
A/K/A “DOVE,” JOHN DOE NO. 26
A/K/A “BLACKMAMBA,” JOHN DOE
NO. 27 A/K/A “BILLNYE,” JOHN DOE
NO. 28 A/K/A “BANEK192,” JOHN DOE
NO. 29 A/K/A SHOPPY ECOMMERCE
LTD, JOHN DOE NO. 30 A/K/A/ FINN
GRIMPE A/K/A “FINNDEV,” AND JOHN
DOES NO. 31-50,
Defendants.

Pursuant to FED. R. CIV. P. 55(a) and Local Civil Rule 55(a), Plaintiff Bungie, Inc.
hereby moves the Clerk to enter default against Defendant Jose DeJesus a/k/a “David
Hastings,” a/k/a “J3ster” (“DeJesus”) based on the following facts:

1. The Amended Complaint in this action – the currently operative complaint in
this action – was filed on June 17, 2024. *See* Dkt. 54.

2. Bungie served the Amended Complaint on DeJesus via process server on
November 17, 2024. *See* Dkt. 84.

3. The affidavit of service attesting to such service on DeJesus was filed on
December 2, 2024. *Id.*

4. Based on that service, under FED. R. CIV. P. 12(a)(1)(A)(i), DeJesus’s response
to the Amended Complaint was due within 21 days of service, specifically, December 9, 2024.

5. However, as of the filing of this Motion, DeJesus has not filed an answer or
other response to the Amended Complaint and has not appeared in this action.

Based on these facts, pursuant to FED. R. CIV. P. 55(a) and Local Civil Rule 55(a),
because it has been shown that Defendant DeJesus has failed to timely plead or otherwise
defend in this action, default should be entered against that Defendant. Bungie therefore
respectfully requests that the Clerk enter Defendant DeJesus’s default.

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Dated this 10th day of January, 2025.

Respectfully submitted,

KAMERMAN, UNCYK, SONIKER &
KLEIN, P.C.

FOCAL PLLC

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Attorneys for Plaintiff Bungie, Inc.

WORD LIMIT CERTIFICATION

I certify that this memorandum contains 206 words, in compliance with the Local Civil
Rules.

By: s/ Stacia N. Lay

Stacia N. Lay, WSBA #30594